

**IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

DEWITT HUGHES and)	
CHERANZETTA HUGHES)	
)	
v.)	
)	
CITY OF CHICAGO, CHICAGO POLICE)	No. 08 C 627
OFFICER IZA, Star #12957, and)	JUDGE DOW
CHICAGO POLICE OFFICER UCZEN)	Magistrate Judge Cox
Star #6857,)	Jury Trial Demanded
Defendants.)	

**DEFENDANT CITY’S MOTION FOR WITHDRAWAL OF COUNSEL, DEFENDANTS’
JOINT MOTION TO EXTEND THE TIME TO COMPLETE THEIR RULE 26(a)(1)
DISCLOSURE, AND DEFENDANT OFFICERS’ MOTION TO EXTEND THE TIME TO
ANSWER PLAINTIFFS’ COMPLAINT**

Defendants, City of Chicago, (“Defendant City”) and Officers Debbie Iza and Mark Ucen, (“Defendant Officers”), jointly referred to as (“Defendants”), by and through one of their attorneys, Susan E. Sullivan, respectfully request that this Honorable Court allow counsel for Defendant City, Kenneth C. Robling and Thomas J. Aumann, to withdraw their appearances on behalf of Defendant City and further request that this Honorable Court extend the time for Defendants to complete their Rule 26(a)(1) Disclosure and for Defendant Officers to answer Plaintiffs’ Complaint until May 13, 2008. In support of this motion, Defendants state as follows:

1. The Court has ordered that the parties to complete their Rule 26(a)(1) Disclosures by April 30, 2008, and for the parties to submit a proposed discovery plan once the Defendant Officers have appeared in this matter. The City of Chicago has answered Plaintiffs’ Complaint and Defendant Officers filed their appearances in this matter on April 29, 2008.

2. Counsel for Defendant City, Mr. Robling and Mr. Aumann, seek to withdraw

their appearances on behalf of Defendant City. Counsel for Defendants, Ms. Sullivan filed an appearance on behalf of Defendant City as well as on behalf of Defendant Officers Iza and Uezen on April 29, 2008, and will be representing all Defendants in this matter.

3. New counsel needs the opportunity to review the file and documents exchanged therein and to meet with her clients before completing Defendants' Rule 26(a)(1) Disclosure and preparing the answer on behalf of the Defendant Officers

4. Defendants respectfully request that this Court grant them additional time, until May 13, 2008, to complete their Rule 26(a)(1) Disclosure, and grant Defendant Officers additional time to answer Plaintiffs' Complaint, until May 13, 2008.

5. This motion has not been filed for the purpose of undue delay. No prejudice will result to Plaintiffs by the granting of this motion.

WHEREFORE, Defendants respectfully requests that this Honorable Court allow counsel for Defendant City of Chicago, Kenneth C. Robling and Thomas J. Aumann, to withdraw their appearances on behalf of Defendant City; grant Defendants additional time, until May 13, 2008, to complete their Rule 26(a)(1) Disclosure, and grant Defendant Officers additional time, until May 13, 2008, to answer Plaintiffs' Complaint.

Respectfully submitted,

SWANSON, MARTIN & BELL, LLP

By: s/ Susan E. Sullivan

As Attorney for Defendants

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CERTIFICATE OF SERVICE

I, the undersigned, do hereby certify that I have caused true and correct copies of the **DEFENDANT CITY'S MOTION FOR WITHDRAWAL OF COUNSEL, DEFENDANTS' JOINT MOTION TO EXTEND THE TIME TO COMPLETE THEIR RULE 26(a)(1) DISCLOSURE, AND DEFENDANT OFFICERS' MOTION TO EXTEND THE TIME TO ANSWER PLAINTIFFS' COMPLAINT** to be sent via e-filing to all attorneys of record on the attached Service List, on April 29, 2008.

Respectfully submitted,

SWANSON, MARTIN & BELL, LLP

By: s/ Susan E. Sullivan

As Attorney for Defendants

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Service List

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